

Checklist For Implementation Of The Privacy And Security Provisions Of The Administrative Simplification Section Of HIPAA

Clinic Name: 121General Hospital

Date:

Point of Contact: LTC Mary Garr

Completed by: 18th MEDCOM HIPAA Compliance Specialist
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Assessment: The assessment points were based on the DoD 6025.18, "DoD Health Information Privacy Regulation," (1/24/2003) and IHO Policy #56. The following chart contains the standard, assessment point, and the clinic current status.

CLINIC WIDE WALK-THROUGH ASSESSMENT

General Issues

| Assessment Point | Yes | No | Notes |
|--|-----|----|-------|
| Are there locks on doors for the filing area or are the file cabinets locked? | | | |
| Can an unauthorized person access the room where patient records are kept? | | | |
| Is the Notice of Privacy Practices (NoPP) posted in a clear and prominent location where it is reasonable to expect that individuals seeking services from the provider will be able to read it? | | | |
| Are the employees aware of HIPAA and patient privacy? | | | |
| Is there a way of tracking HIPAA on-line training of employees/volunteers? | | | |

Inpatient Department Assessment

| Assessment Point | Yes | No | Notes |
|--|-----|----|-------|
| Does the staff understand and practice Opt-Out option? | | | |
| Can any unauthorized person get room/patient information without giving patient's full name? | | | |
| Is there PHI/Patient records laying on counters/desks unauthorized person can see? | | | |
| Are any medical records kept in unlocked/unsecured cabinet/room in the department? | | | |
| Can any persons passing by look into a patient's room while a patient is being treated? | | | |
| Is there PHI displayed outside patient's room? | | | |

Patient Administration Assessment

| Assessment Point | Yes | No | Notes |
|--|-----|----|-------|
| Is the e-mail/fax disclaimer statement used? | | | |
| Does the clinic know where and how to order NoPP? | | | |
| Does the staff understand when an authorization for disclosure is required? | | | |
| Is there a way to track authorizations (ex: forms)? | | | |
| Is there a way to revoke/cancel authorizations? | | | |
| Does the staff understand and practice disclosing only the 'minimum necessary'? | | | |
| Is there a way to track patients' request to restrict disclosure of their PHI? | | | |
| Is there a way to track request for confidential communication? | | | |
| Is there a way to track disclosures made since April 14, 2003? | | | |
| Can a patient request and receive a copy of his/her medical records? | | | |
| Does the staff know who to report privacy violations/complaints? | | | |
| Is the staff able to answer questions regarding patient rights/NoPP? | | | |
| Is NoPP acknowledgement signature label/stamp on the back cover of the patient record? | | | |
| Is there ample supply of NoPP? | | | |

Department Walk-Through Assessment

Department:

| Assessment Point | Yes | No | Notes |
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| Is there a posting on the wall displaying patient's information? | | | |
| Is there a patient "sign-in" sheet that is left on a counter or that is easily seen by other patients who enter the office? | | | |
| Are patient records/files laying on counters or desks that can be seen by patients or other unauthorized persons? | | | |
| Are any medical records kept in unlocked/unsecured cabinet/room in the department? | | | |
| Can any computer screens be seen by anyone approaching the reception desk or checkout area? | | | |
| Can any computer screens be seen by unauthorized persons anywhere else in the office? | | | |
| Do patients have to check in/out in an area that others can easily overhear protected health information such as diagnosis, ordered tests, etc.? | | | |
| Is the fax machine accessible to an unauthorized person walking by and do they have the ability to "pick-up" or read an incoming or outgoing fax message? | | | |
| Is the copy machine accessible to an unauthorized person walking by who may pick-up or read information being copied? | | | |
| Is the printer accessible to an unauthorized person walking by who may pick-up or read information being copied? | | | |
| Is the digital sender accessible to an unauthorized person walking by who may pick-up or read information being copied? | | | |
| Can any persons passing by look into a doctor's room while a patient is being treated? | | | |
| Are the boxes outside doctor's office covered? If not, are the records in the box covered? | | | |

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Additional Assessments/Notes

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